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May 9, 2024

## **VIA ECF**

The Honorable Michael E. Farbiarz
United States District Court
District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, New Jersey 07012

Re: United States v. Domenic J. Gatto, Jr., 21-cr-877 (MEF)

Dear Judge Farbiarz:

We write on behalf of our client, Domenic J. Gatto, Jr., and co-defendant Thomas Farese, with the Government's consent, to respectfully request a modest modification of this Court's November 8, 2023 Trial Scheduling Order (ECF 124). Specifically, the current schedule calls for defendants' expert disclosures to be submitted on or before Thursday, May 16, 2024 (60 days before trial). The defendants respectfully request a brief extension of defendants' deadline to submit expert disclosures from Thursday, May 16, 2024 to Friday, May 24, 2024. This request would not modify any other deadline set by the Trial Scheduling Order.

The Government has advised that it consents to the relief sought in this request. This is defendants' first request to make this modification to the Trial Scheduling Order.

We thank the Court for its consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Seth L. Levine Seth L. Levine Paul A. Murphy

cc: All Counsel of Record (via ECF)